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October 1, 2014

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Re: Civil Action No. 4:13-cv-001164; Tommy Walton v. 3M Company, et al., in the United States District Court for the Southern District of Texas

Dear Counsel,

I am following up from my email last week addressing the deposition schedule for Mr. Walton's case. We intend to take the following depositions in the following order:

1. David Westlin
2. Albert Van Duren
3. Gary Hansen
4. Karl Zagoda
5. Troy Bergstrom
6. Terri Woodwick-Sales
7. Gary Maharaj
8. John Rock
9. Daniel Sessler

As far as our availability, we could take these depositions on 10/27, 10/29-10/31, 11/3-11/7, 11/10-11/4, 11/17-11/19, 11/24, and 11/25. Please let me know what dates in this time frame work for you and we will send you the deposition notices. If I do not have a response by Friday, we will unilaterally notice these depositions.

Also, our expert designation deadline is approaching and I wanted to give you a list of experts we are considering to provide you the opportunity to object per the protective order. Please let me know whether you object to the disclosure of confidential information to any of the following individuals:

1. Christopher M. Varga
2. Andrew James Giles
3. Francis A. Czajka
4. David Ellsworth Cassidy
5. Simon S. Fung
6. Nicholas Baumann
7. Colin Dunlop
8. Scott D. Dickerhoff
9. Bruce Banner
10. Kenneth Diller
11. Michael M. Donnelly
12. Kent Douglas Ellis
13. Scott Augustine
14. Brian Doherty
15. Raymond G. Ragan
16. Thomas P. Anderson
17. Kent D. Ellis
18. Michael Vardenega
19. Allen Hamid Ziaimehr
20. Albert P. Van Duren
21. Carol J. Panser
22. Mark Bieberich
23. Thomas H. Philipot
24. Joseph Blase Vergona
25. Martin Stryker

Please accept this list of potential experts as our disclosure pursuant to paragraph 9(e) of the protective order. We will assume you have no objection to disclosure to any of these individuals if you do not lodge an objection within 10 days.

Finally, upon review of the 40,000 plus pages of documents which have been designated confidential, it is apparent that Defendants' use of the confidential designation was not in good faith within the definition of the protective order and that instead you have merely committed mass, indiscriminate designations. Please resubmit your production and only utilize the confidential stamp for documents that are actually confidential within the definition of the protective order. Please consider this our notice, under paragraph 15 of the protective, that we object to all of your confidential designations for the failure to make any effort to exercise restraint in so designating your production.

Sincerely,



John A. Neuman